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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

ST. CHARLES HEALTH SYSTEM, INC.,
an Oregon nonprofit corporation,

Plaintiff,

v.

OREGON FEDERATION OF NURSES
AND HEALTH PROFESSIONALS,
LOCAL 5017, AFT, AFL-CIO,

Defendant.

Case No. 6:21-cv-00304-MC

**DEFENDANT'S SECOND UNOPPOSED
MOTION FOR EXTENSION OF TIME**

(Deschutes County Circuit Court, Case No.
21CV07024)

LR 7-1 CERTIFICATE OF COUNSEL

Counsel for Oregon Federation of Nurses and Health Professionals, Local 5017, AFT, AFL-CIO certify that they conferred with counsel for Plaintiff, Davis Wright Tremaine LLP, and Mark Hutcheson, who do not oppose this motion.

MOTION

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Defendant respectfully moves this Court to issue an Order extending the deadline by which Defendant is required to file a reply pleading to the Motion for Imposition of Sanctions (ECF 20) and the Court's Order to Show

Cause (ECF 24). The current deadline for the reply is June 23, 2021. Defendant respectfully requests an additional two weeks (July 7, 2021) to prepare the reply brief.

Defendant requests this extension as counsel has been continuing to respond to a family emergency. Work on the brief has also been delayed due to the efforts of the parties to reach a settlement.

Plaintiff and DWT parties do not oppose this motion. This motion is not filed for the purpose of delay and no party will be prejudiced by the granting of this motion. This is the second request for an extension of time filed in this matter.

Respectfully submitted,

Dated: June 15, 2021

HIGHET LAW LLC

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